



# CITY OF LAKE WORTH

1900 2ND AVENUE NORTH  
LAKE WORTH, FLORIDA 33461

RECEIVED

UTILITIES  
DEPARTMENT

FEB 14 2005

(561) 586-1666  
FAX (561) 586-1702

February 10, 2005

BUREAU OF AIR REGULATION

Mr. Scott Sheplak, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Bldg. Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

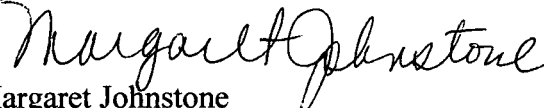
Subject: Title V Responsible Official/ Designated Representative/  
Authorized Representative  
City of Lake Worth Utilities, Tom G. Smith Power Plant  
Facility #0990045

Dear Mr. Sheplak:

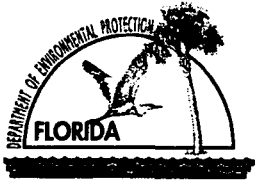
Please be advised that Mr. George Adair has joined the City as Utilities Director/Assistant City Manager. The City Commission has authorized Mr. Adair to be the Responsible Official and Authorized Representative for our Title V Permit and the Designated Representative (DR) under the Acid Rain Program. The notification for the (DR) was published for public comment on February 4, 2005. A copy of the updated DEP Responsible Official form and EPA Certificate of Representation form reflecting this change are attached. The updated Certificate of Representation form will be submitted to EPA as well.

If you have any questions, please call me at 561-533-7384.

Sincerely,  
CITY OF LAKE WORTH UTILITIES

  
Margaret Johnstone  
Environmental Compliance Officer

cc: Mr. Ajaya Satyal, Environmental Manager Palm Beach County Health Dept.  
Mr. Laxmana Tallum, DEP SE District  
Mr. George Adair, Utilities Director/Assistant City Manager  
Dave Mulvay, Power Plant Manager  
Mike Ridge, Environmental/Performance Specialist



# Department of Environmental Protection

RECEIVED

## Division of Air Resource Management

FEB 14 2005

### RESPONSIBLE OFFICIAL NOTIFICATION FORM BUREAU OF AIR REGULATION

**Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.**

#### Identification of Facility

1. Facility Owner/Company Name: City of Lake Worth	
2. Site Name: Tom G. Smith Power Plant and Lake Worth Water Treatment Plant	3. County: Palm Beach
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0990045-AV	

#### Notification Type (Check one or more)

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s). Effective date of change in responsible official(s) <u>February 1, 2005</u>

#### Primary Responsible Official

1. Name and Position Title of Responsible Official: Mr. George Adair, Utilities Director/Assistant City Manager
2. Responsible Official Mailing Address: Organization/Firm: Lake Worth Utilities Street Address: 1900 2 <sup>nd</sup> Avenue North City: Lake Worth State: FL Zip Code: 33461
3. Responsible Official Telephone Numbers: Telephone: (561 ) 586 - 1666 Fax: (561 ) 586 - 1702
4. Responsible Official Qualification (Check one or more of the following options, as applicable): [ ] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. [ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively. [X] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. [X] The designated representative at an Acid Rain source.
5. Responsible Official Statement:  <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>  _____ Signature  _____ Date <u>2/11/05</u>



# Certificate of Representation Page 1

For more information, see instructions and refer to 40 CFR 72.24

This submission is:  New  Revised (revised submissions must be complete; see instructions)

**STEP 1**  
Identify the source by plant name, State, and ORIS code.

Plant Name <b>Tom G. Smith</b>	State <b>FL</b>	ORIS Code <b>0673</b>
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**STEP 2**  
Enter requested information for the designated representative.

Name <b>George Adair, P.E.</b>	
Address <b>1900 2nd Avenue North Lake Worth, FL 33461</b>	
Phone Number <b>561-586-1665</b>	Fax Number <b>561-586-1702</b>
E-mail address (if available) <b>gadair@lakeworth.net</b>	

**STEP 3**  
Enter requested information for the alternate designated representative, if applicable.

Name <b>Anatole Bezugly</b>	
Phone Number <b>561-586-1665</b>	Fax Number <b>561-586-1702</b>
E-mail address (if available) <b>abezugly@lakeworth.net</b>	

**STEP 4: Complete Steps 5 and 6, read the certifications, sign and date.**

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the 'designated representative' for the affected source and each affected unit at the source identified in this certificate of representation, in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

The agreement by which I was selected as the alternate designated representative, if applicable, includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

Plant Name (from Step 1) **Tom G. Smith**

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Signature (designated representative) <i>Tom G. Smith</i>	Date 2/11/05
Signature (alternate designated representative) <i>A. Bezugly</i>	Date 2/11/05

**STEP 5**  
Provide the name of every owner and operator of the source and identify each affected unit they own and/or operate.

Name <b>City of Lake Worth</b>					<input checked="" type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
ID# S-3	ID# S-4	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

Name					<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#
ID#	ID#	ID#	ID#	ID#	ID#	ID#

**STEP 6**  
For any new affected units listed at STEP 5 that have not commenced commercial operation, enter the projected date on which the unit is expected to commence commercial operation.

ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:
ID#	Projected Commence Commercial Operation Date:

State of Florida Department of Environmental Regulation  
Lake Worth Utilities Authority  
Unit S-5  
Case No. PA-74-05  
CONDITIONS OF CERTIFICATION

SIGNED 3/27/96

GENERAL

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State of Florida Department of environmental Regulation  
Lake Worth Utilities Authority  
Unit S-5  
Case No. PA-74-05

CONDITIONS OF CERTIFICATION

GENERAL

1. Change in Discharge

All discharges or emissions authorized herein shall be consistent with the terms and conditions of this certification. The discharge of any pollutant not identified in the application, or more frequent than, or at a level in excess of that authorized herein, shall constitute a violation of the certification. Any anticipated facility expansions, production increases, or process modifications which will result in new, different or increased discharges of pollutants or expansion in steam generating capacity must be reported by submission of a new application.

2. Noncompliance Notification

If, for any reason, the permittee does not comply, with or will be unable to comply with any limitation specified in this certification, the permittee shall notify the Central and Southern District Manager of the Department by telephone during the working day that said noncompliance occurs and shall confirm this in writing within seventy-two (72) hours of becoming aware of such conditions, and shall supply the following information:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this certification.

4. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact resulting from noncompliance with any limitation specified in this certification, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying Discharge.

Modified 03/14/96

5. Right of Entry

The permittee shall allow the Secretary of the Florida Department of Environmental Regulation and/or authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises where an effluent source is located or in which records are required to be kept under the terms and conditions of this permit; and
- b. To have access to and copy any records required to be kept under the conditions of this certification; and
- c. To inspect any monitoring equipment or monitoring method required in this certification and to sample any discharge or pollutants.

6. Revocation or Suspension

This certification may be suspended or revoked pursuant to Section 403.512, Chapter 403, Florida Statutes, or for violations of any General or Special Conditions.

7. Civil and Criminal Liability

This certification does not relieve the permittee from civil or criminal penalties for noncompliance with any condition of this certification, applicable rules or regulations of the Department or Chapter 403, Florida Statutes, or regulations there under. Subject to 403-511 this certification shall not preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any other applicable State Statutes, or regulations.

8. Property Rights

The issuance of this certification does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations. The applicant will obtain title, lease or right of use from the State of Florida, to any sovereign submerged lands occupied by intake or discharge structures.

9. Severability

The provisions of this certification are severable, and if any provision of this certification or the application of any provision of this certification to any circumstances, is held invalid, the application of such provision to other circumstances and the remainder of the certification shall not be affected thereby.

Modified 03/14/96

10. Pollutants

If any applicable state effluent or emission standard or prohibition (including any schedule of compliance specified in such effluent or emission standard or prohibition) is established for a pollutant which is in this certification and such standard or prohibition is more stringent than any limitation for such pollutant in this certification, this certification shall be revised in accordance with the new effluent or emission standard or prohibition and the permittee so notified, unless a variance is or has been obtained pursuant to Chapter 403, Florida Statutes. In the application of such later adopted standards this paragraph shall not be considered in determining whether or not the Unit S-5 is classified as a new source or as an existing source if such distinction is made within the later adopted standard.

11. Review of Site Certification

The certification shall be final unless revoked or suspended pursuant to law. Five years from the date of issuance of any National Pollutant Discharge Elimination System Permit issued pursuant to the Federal Water Pollution Control Act Amendments of 1972, for the plant units, the Department shall review all monitoring data that has been submitted to it during the preceding five year period for the purpose of determining the extent of the permittee's compliance with the conditions of this certification and the environmental impact of this facility. The Department shall submit the results of its review and recommendations to the Permittee and all parties of record in this certification proceeding. This review will be repeated every five years thereafter.

12. Modifications of Special Ccnditions

The Department may modify the provisions of the special conditions dealing with sampling, monitoring, reporting, and specifications for control Equipment or related time schedules as necessary to attain the objectives of Chapter 403, F.S., upon mutual agreement with the applicant. Such modifications and agreement shall be in writing. Such modifications will not take effect until after notice to all parties of record and until after a public notice giving a period of thirty days for public review and comment. The Secretary shall provide opportunity for a public hearing on the proposed modifications prior to taking final agency action.



State of Florida Department of Environmental Regulation  
Lake Worth Utilities Authority

Unit S-5

Case No. PA 74-05

CONDITIONS OF CERTIFICATION (Modified 03/14/96)

SPECIAL

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State of Florida Department of Environmental Regulation Lake Worth Utilities Authority  
Unit S-5  
Case No. PA 74-05

CONDITIONS OF CERTIFICATION

SPECIAL

I. Air

The construction and operation of the Unit S-5 shall be in compliance with all applicable provisions of Chapters 17-2, 17-5 and 17-7, Florida Administrative Code, and the permittee shall comply with the following conditions of certification:

1. Fuel consumed should contain not more than 2.25% sulfur in Units S-3 and S-4 nor more than 0.35% sulfur in Unit S-5.
2. The boiler exhaust stack shall be not less than 75 feet above grade.
3. The permittee shall provide sampling ports into the stack and will provide access to the sampling ports by a ladder and platform or by temporary means as well as such temporary facilities as may be requested by the Department of Environmental Regulation in order that stack sampling may be accomplished.
4. The permittee shall install and operate continuous monitoring devices on the stack for sulfur dioxide, opacity and nitrogen oxides. Records of such monitoring shall be available for inspection. Calculation of SO<sub>2</sub> emissions in accordance with the procedures outlined in Section 60.45, of 40 CFR, Part 60, may be utilized instead of the continuous SO<sub>2</sub> monitor.
5. The permittee shall install and operate two ambient air monitoring devices for sulfur dioxide and two particulate samplers. The location of these ambient air samplers shall be as determined by the Palm Beach County Health Department, Division of Environmental Sciences and Engineering. The data collected will be reported to the County health Department quarterly by the 20th of each subsequent month. The permittee shall institute the monitoring program one year prior to operation of Unit S-5.
6. The permittee shall maintain an hourly log of fuels used and copies of fuel analyses containing information of sulfur content and heating value to enable calculations of emissions.

Modified 03/14/96

7. The permittee shall comply with the following emission standards for NO<sub>x</sub>.

a. Emissions of NO<sub>x</sub> from unit GT-2/S-5 shall not exceed 0.50 lb./million BTU while firing natural gas and 0.90 lb./million Btu while firing fuel oil.

b. Compliance for unit GT-2/S-5 shall be demonstrated by annual emission testing in accordance with EPA Test Method 7E. Emission testing shall be completed by February 28th of each year. Annual compliance testing while firing oil is not required for units that operated on oil for less than 400 hours in the previous federal fiscal year (ending September 30th). The permittee shall submit to the Palm Beach County Public Health Unit, Air Section, and to the Department of Environmental Protection, Southeast District Office, Air Program, written confirmation that testing while firing oil is not required, in lieu of submitting an emission test report for each unit that is not tested each year.

c. All required emission testing shall be performed no later than February 28th of each year, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of return to service.

d. Compliance testing shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emissions unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more that 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity. [F.A.C. Rule 62-297.310 (2)]

## II. Water

### A. Pretreatment Standards

Wastewater discharged from Unit S-5 to the Lake Worth municipal sewerage system shall comply with Annex III of the Sewer Service Agreement between the Lake Worth Utilities Authority and the City of West Palm Beach and the pretreatment standards for new sources as contained in 40 CFR, Part 423.16 and amendments. The latter is set forth as follows:

Modified 03/14/96

EPA Pretreatment Standards and Standards of Performance for New Sources

Parameter Avg. 30-Day, Daily Value

a) Low Volume Waste (40 CFR, Part 423.15 (c))

(ion exchange water treatment systems, floor drainage, sample drains, cooling tower basin cleaning wastes, and similar wastes)

TSS	30 mg/l
Oil and Grease	15 mg/l

b) Metal Cleaning Wastes (40 CFR, Part 423.15 (f))

TSS	30 mg/l
Oil and Grease	15 mg/l

Copper, Total	1.0 mg/l
Iron, Total	1.0 mg/l

c) Boiler Blowdown (40 CFR, Part 423.15(g))  
Same limits as for b) Metal Cleaning Wastes.

d) Cooling Tower Blowdown (40 CFR, Part 423.15(i))

Zinc	no detectable amount
Chromium	no detectable amount

Materials for corrosion inhibition	no detectable amount
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e) The pH of all discharges shall be within the range of 6.0 - 9.0.

f) There shall be no discharge of polychlorinated biphenyl compounds such as those commonly used for transformer fluid, or other toxic substances.

B. In-Plant Water Monitoring Program

A monitoring program shall be undertaken by the Lake Worth Utilities Authority on the effluent streams within the facility to determine compliance by Unit S-5 with the applicable pretreatment standards.

Modified 03/14/96

III. Stormwater Runoff

During construction and operation, necessary measures shall be employed to settle, filter or absorb silt so that the runoff shall not exceed 50 ng/l of suspended solids. Such measures may include sediment traps, barriers and the use of berms or vegetation. Exposed or disturbed soil shall be sodded as soon as possible to minimize silt and sediment runoff into waters of the State.

IV. Solid Wastes

Solid wastes generated by the construction or operation of the facility shall be handled and disposed of in conformance with Chapter 17-7, FAC. Open burning will not be allowed.

V. Special Study

The Lake Worth Utilities Authority shall conduct a special study and furnish to the Department by January 3, 1977; a contingency plan to increase the intertie capability with Florida Power and Light Company in order to produce a source of electricity in the event that gaseous or liquid fuels become uneconomical or unavailable for continued operation of Unit S-5 in compliance with the conditions of certification.